

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Sunset Financial Group, Inc., an Oklahoma)
corporation; Vision Services, Inc., and Oklahoma)
corporation; Amsterdam Fidelity Business Trust,)
a Nevada Limited liability partnership; EASE)
Corporation, an Oklahoma corporation; Gold Star)
Properties, Inc., an unincorporated association;)
Rebates International, Inc., a Nevada corporation;)
Betty Solomon Brokerage, Inc., an Oklahoma)
corporation; Emzie Huletty, an individual;)
Grover H. Phillips, an individual; Nicholas Krug,)
an individual; Charles E. Elliott, an individual;)
Terry Mahon, an individual; Denver Large, an)
Individual; Betty G. Solomon, an individual; and)
Donald J. Wood, an individual,)
)
Defendants.)

CJ-2003-7899

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

SEP 24 2008

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

RECEIVER'S APPLICATION TO APPROVE MAILING PROCEDURE

L. Win Holbrook, the duly appointed receiver in the above styled and numbered proceeding (the "Receiver"), by and through his undersigned counsel, requests hereby an order from this court approving a mailing procedure for service of the Report of Receiver and the Joint Motion for Approval of Investor Claim Designations and Distribution to Investors to be filed herein, and in support of said request, the Receiver states as follows:

1. On September 19, 2003, the Oklahoma Department of Securities (the "Department") filed a Petition for Permanent Injunction and other Equitable Relief (the "Petition") against Sunset Financial Group, Inc., Vision Services, Inc., Amsterdam Fidelity

Business Trust, EASE Corporation, Gold Star Properties, Inc., Rebates International, Inc., Betty Solomon Brokerage, Inc., Emzie Huletty ("Huletty"), Grover H. Phillips ("Phillips"), Nicholas Krug, Charles E. Elliott, Terry Mahon ("Mahon"), Denver Large, Betty G. Solomon and Donald J. Wood (collectively, "Defendants"). The Department alleged that the Defendants violated the Oklahoma Securities Act by engaging in a prime bank scheme involving the sale of interests in high-yield investment programs and a rebate coupon which guaranteed full repayment of a commercial or residential loan. An order was issued against the Defendants by this Court to cease their illegal activities.

2. By order dated September 19, 2003 (the "Receivership Order"), Receiver was appointed receiver of the Defendants Sunset Financial Group, Inc., Vision Services, Inc., Amsterdam Fidelity Business Trust, EASE Corporation, and Solomon Brokerage, Inc. (the "Receivership Defendants").

2. Pursuant to the terms of the Receivership Order, the Receiver was charged, *inter alia*, with taking "exclusive custody, control and possession of all assets and documents of, or in the possession or custody, or under the control of, the Receivership Defendants, including those assets of Receivership Defendants in the possession or custody, or under the control of, Defendants Emzie Huletty, Grover H. Phillips, Betty G. Solomon and Donald J. Wood, wherever situated."

3. By order dated September 3, 2004 (the "Final Order"), Defendants Amsterdam Fidelity Business Trust, Rebates International, Inc., Grover H. Phillips, Terry Mahon, and Denver Large (the "Rebates Defendants") were ordered to pay to Receiver the sum of Three

Hundred Four Thousand, Six Hundred Sixty-four Dollars and Twenty-two Cents (\$304,664.22) to be used for restitution to Investors.¹

4. In addition to the rebate coupons Defendants provided to Investors as referenced in paragraph one above, rebate coupons were also furnished by Defendants to purchasers of various consumer products or services (the "Non-Investors").

5. The Receiver has continued in his efforts to complete his duties as charged and believes all cash to be derived from the various Defendants has now been obtained by Receiver.

6. The Receiver has now prepared a report concerning the instant receivership (the "Report") and a Joint Motion for Approval of Investor Claim Designations and Distribution to Investors (the "Distribution Motion"). As detailed in the Report and Distribution Motion, only Investors who are not insiders of the Defendants shall receive any restitution under the distribution proposed by Receiver.

7. Due to the number of Investors, which are in excess of 100, and Non-Investors, which are in excess of 900, the costs associated with mailing of the entire Report and Distribution Motion would dilute substantially the funds remaining to be distributed to the Investors. Accordingly, a streamlined procedure should be approved by the Court for the Receiver to give notice of the filing of the Report and Distribution Motion.

8. Receiver proposes the following notice, in the form of a post-card mailing, for purposes of service of the Report:

IN CONNECTION WITH THE REFERENCED CASE PLEASE
TAKE NOTICE THAT THE REPORT OF THE RECEIVER,
AND THE JOINT MOTION FOR APPROVAL OF INVESTOR
CLAIM DESIGNATIONS AND DISTRIBUTION TO
INVESTORS, HAVE BEEN FILED. COPIES MAY BE VIEWED
ON THE WEBSITE OF THE OKLAHOMA DEPARTMENT OF

¹ Defined in the Petition as those individuals who purchased interests in the high-yield investment programs referenced herein.

SECURITIES [WWW.SECURITIES.OK.GOV.], OR OBTAINED FROM HOLBROOK & TOFFOLI, 2205 FIRST NATIONAL CENTER, 120 NORTH ROBINSON, OKLAHOMA CITY, OKLAHOMA 73102, (405) 232-3664. A HEARING ON THE REPORT AND THE JOINT MOTION HAS BEEN SCHEDULED FOR THE ___ DAY OF _____, 2008, AT ___ O'CLOCK __.M. BEFORE THE HONORABLE CAROLYN R. RICKS, DISTRICT JUDGE, OKLAHOMA COUNTY COURTHOUSE, OKLAHOMA CITY, OKLAHOMA.

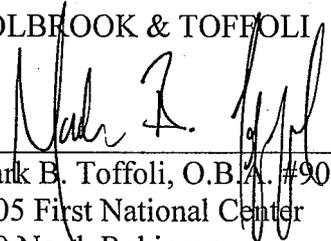
UNDER THE RESTITUTION PROPOSED BY THE RECEIVER, IF YOU ARE THE HOLDER OF A REBATE COUPON YOU RECEIVED AS THE RESULT OF THE PURCHASE OF A CONSUMER PRODUCT OR SERVICE, INCLUDING A VACATION TRAVEL PLAN, YOU WILL NOT RECEIVE A DISTRIBUTION, IF YOU PARTICIPATED IN THE EQUITY ASSET SURVEY (EAS) YOU WILL RECEIVE A DISTRIBUTION, ESTIMATED TO BE APPROXIMATELY 15% OF THE AMOUNT OF YOUR INVESTMENT. NO INDIVIDUAL INVOLVED IN THE SALE OF A HIGH YIELD INVESTMENT PROGRAM WILL RECEIVE A DISTRIBUTION.

The proposed post card mailing is attached hereto as Exhibit "A" and by reference made a part hereof.

WHEREFORE, based on the foregoing, Receiver respectfully requests the court enter its order approving the service of the Report of Receiver and Joint Motion for Approval of Investor Claim Designations and Distribution to Investors as outlined hereinabove.

Respectfully submitted,

HOLBROOK & TOFFOLI



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Attorneys for Receiver

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF SECURITIES,)
PLAINTIFF,)
v.)
SUNSET FINANCIAL GROUP, INC., ET AL.,)
DEFENDANTS.)

CJ-2003-7899

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UNDER THE RESTITUTION PROPOSED BY THE RECEIVER IF YOU ARE THE HOLDER OF A REBATE COUPON YOU RECEIVED AS THE RESULT OF THE PURCHASE OF A CONSUMER PRODUCT OR SERVICE, INCLUDING A VACATION TRAVEL PLAN, YOU WILL NOT RECEIVE A DISTRIBUTION. IF YOU PARTICIPATED IN THE EQUITY ASSET SURVEY (EAS) YOU WILL RECEIVE A DISTRIBUTION, ESTIMATED TO BE APPROXIMATELY 15% OF THE AMOUNT OF YOUR INVESTMENT. NO INDIVIDUAL INVOLVED IN THE SALE OF A HIGH YIELD INVESTMENT PROGRAM WILL RECEIVE A DISTRIBUTION.

L. WIN HOLBROOK, RECEIVER